California Service Corps
Program Committee Meeting
September 28, 2005

Beverly Hills Civic Center
Beverly Hills City Hall Council Room
455 North Rexford Drive
Beverly Hills, CA 90210

AGENDA

Wednesday, September 28, 2005
8:00 a.m. – 2:00 p.m.

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8:00 – 8:05	Welcome and Introductions	Ann Marie Occhipinti Bob Riley
8:05 – 8:15	2005-06 AmeriCorps Update	David Muraki
8:15 – 8:30	2006-07 AmeriCorps Overview • Overview of 2006-07 Portfolio • Appropriations Update • Corporation Updates • Grantmaking Calendar and Outreach	David Muraki Kaira Esgate
8:30 – 9:15	Review Staff Recommendation – Program Design Policies	Staff
9:15 – 10:00	Public Comment on Staff Recommendation – Program Design Policies	
10:00 – 10:45	Program Design Policies Discussion	Commissioners

ACTION ITEM: Adopt Program Design Policy Revisions

10:45 – 11:30	Review Staff Recommendation – Grantmaking Policies	Staff
11:30 – 12:15	LUNCH	
12:15 – 1:00	Public Comment on Staff Recommendation – Grantmaking Policies	
1:00 – 1:45	Program Design Policies Discussion	Commissioners

ACTION ITEM: Adopt Grantmaking Policy Revisions

1:45 – 2:00	Next Steps	Kaira Esgate
2:00	Adjourn	Ann Marie Occhipinti
		Bob Riley

2006 AmeriCorps Grantmaking Policies
CSC STAFF RECOMMENDATION
Grantmaking Policy A.1. – AmeriCorps Selection Criteria

Background

The Corporation has a long established set of AmeriCorps Selection Criteria that it utilizes in selecting grantees. Generally, these criteria fall into one of three categories: program impact, program design, and geographic need. Program impact criteria include those related to the need to be met, the involvement of the community in the program, and the value of the training and service experiences provided to members. Program design criteria include those related to organizational capacity to administer the proposed program, program innovation and replicability, as well as cost effectiveness and sustainability. Geographic need includes additional selection considerations, including programs operating in empowerment zones, low income communities, and/or environmentally distressed communities.

With the release of the new AmeriCorps rule, the Corporation has refined its selection criteria and more deliberately articulated the additional considerations it will use in selecting grantees (formerly geographic need). Staff recommends adopting the revised Corporation selection criteria as noted below, and creating an additional policy that articulates additional Corporation selection considerations.

Staff Recommendation

AmeriCorps Selection Criteria consist of program design (50 percent), organizational capability (25 percent) and cost-effectiveness and budget adequacy (25 percent). Program design consists of three subcomponents: rationale and approach (10 percent), member outputs and outcomes (20 percent), and community outputs and outcomes (20 percent). Cost-effectiveness and budget adequacy consists of two subcomponents: cost-effectiveness (15 percent) and budget adequacy (10 percent).

Rationale and Approach (10 percent)
In evaluating the proposal's rationale and approach, the Corporation considers:
- Whether the proposal describes and adequately documents a compelling need within the target community, including a description of how the need was identified;
- Whether the proposal includes well-designed activities that address the compelling need, with ambitious performance measures, and a plan or system for continuous program self-assessment and improvement;
- Whether the proposal describes well-defined roles for participants that are aligned with the identified needs and that lead to measurable outputs and outcomes; and,
- The extent to which the proposed program or project:
  - Effectively involves the target community in planning and implementation;
  - Builds on (without duplicating), or reflects collaboration with, other national and community service programs supported by the Corporation; and,
  - Is designed to be replicated.

Member Outputs and Outcomes (20 percent)
In evaluating member outputs and outcomes, the Corporation considers the extent to which the proposal:
- Includes effective and feasible plans for, or evidence of, recruiting, managing, and rewarding diverse members, including those from the target community, and demonstrating member satisfaction;
- Has succeeded in meeting reasonable member enrollment and retention targets in prior grant periods, as determined by the Corporation (current grantees);
- Includes effective and feasible plans for, or evidence of, developing, training, and supervising members;
- Demonstrates well-designed training or service activities that promote and sustain post-service, an ethic of service and civic responsibility, including structured opportunities for members to reflect on and learn from their service; and,
- Has met well-defined, performance measures regarding AmeriCorps members, including any applicable national performance measures, and including outputs and outcomes (current grantees).

Community Outputs and Outcomes (20 percent)
In evaluating community outputs and outcomes, the Corporation considers the extent to which the proposal:
- Is successful in meeting targeted, compelling community needs, or the extent to which current grantees have met their well-defined, community-based performance measures, including any applicable national performance measures, and including outputs and outcomes, in previous grant cycles, and is continually expanding and increasing its reach and impact in the community;
- Has an impact in the community that is sustainable beyond the presence of federal support;
- Generates and supports volunteers to expand the reach of the program in the community; and,
- Enhances capacity-building of other organizations and institutions important to the community, such as schools, homeland security organizations, neighborhood watch organizations, civic associations, and community organizations, including faith-based organizations.

Organizational Capability (25 percent)
In evaluating organizational capability, the Corporation considers the following:
- The extent to which the organization has a sound structure including:
  - The ability to provide sound programmatic and fiscal oversight;
  - Well-defined roles for the board of directors, administrators, and staff;
  - A well-designed plan or systems for organizational (as opposed to program) self-assessment and continuous improvement; and,
  - The ability to provide or secure effective technical assistance.
- Whether the organization has a sound record of accomplishment as an organization, including the extent to which it:
  - Generates and supports diverse volunteers who increase the organization's capacity;
  - Demonstrates leadership; and,
  - Has secured the matching resources as reflected in your prior grant awards (current grantees);

- The extent to which the organization is securing community support that recurs, expands in scope, or increases in amount, and is more diverse, as evidenced by:
  - Collaborations that increase the quality and reach of service and include well-defined roles for faith-based and other community organizations;
  - Local financial and in-kind contributions; and,
  - Supporters who represent a wide range of community stakeholders.
- In applying the criteria in paragraph (a) of this section to each proposal, the Corporation may take into account the following circumstances of individual organizations:
  - The age of the organization and its rate of growth; and
  - Whether the organization serves a resource-poor community, such as a rural or remote community, a community with a high poverty rate, or a community with a scarcity of philanthropic and corporate resources.

Cost-Effectiveness (15 percent)
- In evaluating the cost-effectiveness and budget adequacy of your proposed program, the Corporation considers the following:
- The program's proposed Corporation cost per MSY;
- Other indicators of cost effectiveness, such as:
  - The extent to which the program demonstrates diverse non-federal resources for program implementation and sustainability;
  - The extent to which the program is increasing its share of costs to meet or exceed program goals (current grantees); or,
  - The extent to which the program is proposing deeper impact or broader reach without a commensurate increase in federal costs (current grantees); and,
  - Whether the budget is adequate to support the program design.
- In applying the cost-effectiveness criteria, the Corporation will take into account the following circumstances of individual programs:
  - Program age, or the extent to which the program brings on new sites;
  - Whether the program or project is located in a resource-poor community, such as a rural or remote community, a community with a high poverty rate, or a community with a scarcity of corporate or philanthropic resources;
  - Whether the program or project is located in a high-cost, economically distressed community, measured by applying appropriate federal and state data; and,
  - Whether the reasonable and necessary costs of the program or project are higher because they are associated with engaging or serving difficult-to-reach populations, or achieving greater program impact as evidenced through performance measures and program evaluation.

Budget Adequacy (10 percent)

2006 AmeriCorps Grantmaking Policies
CSC STAFF RECOMMENDATION
Grantmaking Policy A.2. – Additional Corporation Selection Considerations

Background

The Corporation reserves the right to use additional selection criteria in order to develop a balanced portfolio of programs across the country. These criteria are articulated in the new rule.

Staff Recommendation

Staff recommends adoption of the Corporation's additional selection criteria, as articulated below:

Program Models
- Programs operated by community organizations, including faith-based organizations, or programs that support the efforts of community organizations, including faith-based organizations, to solve local problems; and,
- Professional Corps programs.

Program Activities
- Programs that serve or involve children and youth, including mentoring of disadvantaged youth and children of prisoners;
- Program that address educational needs, including those that carry out literacy and tutoring activities generally, and those that focus on reading for children in the third grade or younger;
- Programs that focus on homeland security activities that support and promote public safety, public health, and preparedness for any emergency, national or man-made;
- Programs that address issues relating to the environment;
- Programs that support independent living for seniors or individuals with disabilities;
- Programs that increase service and service-learning on higher education campuses in partnership with their surrounding communities;
- Programs that foster opportunities for Americans born in the post-World War II baby boom to serve and volunteer in their communities; and,
- Programs that involve community-development by finding and using local resources, and the capacities, skills, and assets of lower-income people and their community, to rejuvenate their local economy, strengthen public and private investments in the community, and help rebuild civil society.

Programs Supporting Distressed Communities
- Communities designated as an empowerment zone or redevelopment area, targeted for special economic incentives, or otherwise identifiable as having high concentrations of low-income people;
- An area that is environmentally distressed, as demonstrated by federal and state data;
- An area adversely affected by federal actions related to managing federal lands that result in significant regional job losses and economic dislocation;

- An area adversely affected by reductions in defense spending or the closure or realignment of a military installation;
- An area that has an unemployment rate greater than the national average unemployment for the most recent 12 months for which state or federal data are available;
- A rural community, as demonstrated by federal and state data; and,
- A severely economically distressed community, as demonstrated by federal and state data.

Other Programs
- Programs that meet additional priorities as the Corporation determines and disseminates in advance of the selection process.

2006 AmeriCorps Grantmaking Policies
CSC STAFF RECOMMENDATION
Grantmaking Policy B.1. – Eligible Applicants – Existing Programs

Background
In any given year, there are two types of applicants – new/recompeting applicants and continuation applicants. New applicants are defined per CSC's grantmaking policy C.1. Recompeting applicants are those who have completed a three-year grant cycle (in most instances) and must now "recompete" for continued funding. Continuation applicants are programs submitting requests for years two and three of the three-year grant cycle.

For 2006-07, CSC has 28 recompeting programs (8 competitive and 20 formula). In addition, 29 programs (17 competitive, 11 formula, and 1 Education Award program) will enter the third year of their three-year grant period.

Recompeting programs often request expansion funding through a combination of increased MSYs and a reconfigured budget that more accurately reflects the program's expenses. Continuation requests are typically submitted for the same number of MSYs with minor changes in the budget request due to inflationary cost per MSY increases, or cost per MSY reductions based on CSC's cost per MSY schedule. Historically, the Corporation has supported extremely limited expansion requests for competitive continuation programs. Formula expansion requests may be approved at CSC's discretion.

Staff Recommendation
The staff recommendation consists of three components:

- All existing programs entering the final year of their grant period will be eligible for recompetition. Such programs will receive a program assessment completed by their program officer that assesses the program's risk indicators as well as its member enrollment and retention data and Corporation Inspector General audit findings (if applicable). The program assessment will be sent to all programs eligible for recompetition no later than September 30, 2005. All continuation programs will receive the assessment no later than October 31, 2005.

- Support continuation requests for formula and competitive programs, allowing for inflationary increases in the cost per MSY (per revised cost per MSY policy, if approved). There will be no increase to the total number of MSYs.

- Formula continuation applicants who apply but are unsuccessful in their attempts to secure competitive funding will remain eligible to receive funding for the remaining years of their existing formula grant.

2006 AmeriCorps Grantmaking Policies
CSC STAFF RECOMMENDATION
Grantmaking Policy B.3. – Funding – Cost per MSY

Background

In 1999, CSC established its Cost per MSY policy. This policy consists of four components: 1) a Cost per MSY schedule that sets the maximum funding per MSY a program may request depending on the number of years it has received an operating grant; 2) a mid-year budget adjustment based on member enrollment figures following the program's last day to enroll members; 3) an assessment which examines member recruitment and retention in evaluating the size of future continuation requests; and, 4) an end of year budget adjustment based on actual member enrollment and retention. The first component is typically reviewed each year by the Program Committee.

For the 2006-07 program year, Corporation policy limits the cost per MSY to $16,000. In addition, the average cost per MSY for the entire state portfolio may not exceed $12,600. Staff estimates that CSC's cost per MSY for the 2005-06 program year will be approximately $10,551.

Per the first component of the policy, CSC requires programs to "ramp down" their program's reliance on AmeriCorps funding over time according to the following schedule:

Entering Year of AmeriCorps Funding	2005-06 Maximum Cost per MSY
1-4	$15,675
5	$15,215
6	$14,755
7	$14,295
8	$13,735
9	$13,375
10	$12,915
11	$12,455
12	$11,995

Historically, CSC's cost per MSY schedule has been adjusted upward as follows to account for increases in the minimum living allowance for members, rising health care costs, and additional programmatic requirements.

Staff Recommendation

Retain the 2005-06 cost per MSY schedule; however, add program years 13-15 to account for veteran programs. The following schedule applies to the program's legal applicant and is based on the number of years that the applicant has received an operating grant:

Entering Year of AmeriCorps Funding	2006-07 Maximum Cost per MSY
1-4	$15,675
5	$15,215
6	$14,755
7	$14,295
8	$13,735
9	$13,375
10	$12,915
11	$12,455
12	$11,995
13	$11,535
14	$11,075
15	$10,615

Further, clarify that each program's cost per MSY should be adjusted on an annual basis per the cost per MSY schedule.

The Program Committee will annually review this policy to determine whether to allow for increases in the cost per MSY.

For 2006-07, allow for a 3 percent increase in cost per MSY, not to exceed the ramp down, except for programs that do not provide a living allowance.

2006 AmeriCorps Grantmaking Policies
CSC STAFF RECOMMENDATION
Grantmaking Policy B.5. – Operating, Planning, and Program Development Grants

Background
CSC has established three grant types:

- Operating Grants (new, recompetes, and continuation) – funds provided to support AmeriCorps members and their respective service activities;
- Planning Grants – funds to support the development of an AmeriCorps operating grant proposal – planning grants in California have been provided to support the development of programs that meet stated Corporation priorities; and,
- Program Development Grants – provide one-year funding to operating grant applicants, who were unsuccessful due to funding and/or MSY limitations, but will receive operating grants in years two and three of the grant cycle – funds are used to establish program systems, including site orientation and member recruitment.

Staff Recommendation
Utilize 2006-07 AmeriCorps funding to support operating grants. Offer program development grants if and only if formula funding is available and MSY limitations prevent formula funding from being fully utilized.

Utilize an estimated $1 million in 2004-05 AmeriCorps formula carryover funds to provide planning grants of two types: 1) for applicants that propose program designs consistent with stated *Corporation or state priorities*; and, 2) for applicants that propose program designs consistent with potential 2007-08 CSC AmeriCorps *state funding priorities or initiatives*. These estimated carryover funds must be expended by December 31, 2006.

- Corporation or state priority planning grants will support local partnerships that wish to develop a 2007-08 AmeriCorps application and will not exceed $50,000.

- State funding priority or initiative planning grants will support statewide or regional networks and organizations, intermediaries, state agencies/departments, etc. that have the potential to become an initiative partner or represent a network of ideal applicants for a state funding priority. Planning grants of this type will not exceed $100,000.

2006 AmeriCorps Grantmaking Policies
CSC STAFF RECOMMENDATION
Grantmaking Policy B.7. – Funding – Maximum Grant Size

Background

With the intent of funding as many high quality programs throughout the state as possible, CSC has established this policy that sets maximum grant sizes. Maximum grant sizes for population-based "formula" grants have been set lower than "competitive" grants awarded through national competition. In addition, new applicants who apply for formula funds have be limited to a smaller request than those seeking competitive funds. Historically, the amount of funding for formula grants has been less than the amount available for competitive grants. The purpose of formula grants is to support AmeriCorps service throughout California. Maximum limits have been set for competitive grants only when the amount of funding available nationally is limited.

Existing policy includes two parts:

Part A applies to "major" grant cycles, such as 2006-07, in which greater amount of funding is available for competition. New programs can request no more than $425,000 in formula funds and existing programs may request no more than $850,000 in formula funds. Programs seeking competitive funds are not subject to a maximum limit.

Part B applies to "off cycle" years during which a smaller amount of funding is available. In the past, CSC has set a maximum grant request of $500,000 for formula, competitive, new, and expansion grants during these years.

Assuming level formula funding for 2006-07 ($10.5 million), staff estimates that slightly over $5 million in formula funding will be available. Current commitments to recompeting formula programs exceed $6.4 million.

The Corporation estimates that it will have approximately $43 million available for the national competition. If California were to secure its population fair share, it would receive approximately $5.3 million. Current commitments to recompeting competitive programs exceed $8 million.

Staff Recommendation

Establish four types of applicants for the purposes of this policy (as well as grantmaking policy C.1.):

- New applicant – applicant that meet the definition outlined in grantmaking policy C.1.
- Experienced applicant – applicant that does not meet the definition of a new applicant, but that proposes an AmeriCorps program that has not previously operated
- Previous program – applicant that proposes a program that is similar in scope and purpose to one previously administered by the partnership in the last five program years

- Recompeting program – applicant that proposes to renew its current program design for a new three-year cycle

Set maximum limit for new applicants and experienced applicants seeking formula funds at $425,000.

Set maximum limit for previous programs and recompeting programs seeking formula funds at $850,000.

Programs that are unsuccessful in their attempt to secure competitive funding will be considered for formula funding, based on their ranking on the state ranking list as funding permits.

2006 AmeriCorps Grantmaking Policies
CSC STAFF RECOMMENDATION
Grantmaking Policy C.1. – Portfolio – New Programs

Background

CSC actively conducts outreach to, and encourages the participation of, new applicants prior to every three-year grant competition. CSC has adopted a policy that explicitly provides for strong representation of new applicants in its portfolio. CSC's policies have been consistent with those of the Corporation in valuing new applicants.

In the past CSC policy required that at least 40 percent of the portfolio be composed of new programs. Policy was changed to the current version to enable more effective implementation. The latest version of the policy was passed in January 2001 to *"enable new programs whose applications meet a basic minimum score to compete successfully against existing programs."* This policy provides applicants that meet the *"new"* definition an additional 10 percent to their score. Thus an application from a new program receiving a perfect score would be awarded 110 points. The 10 percent score adjustment is calculated and added following the completion of the peer review and staff interview processes, and results in what is known as the "merit score." Current policy also states that the 10 percent adjustment will be suspended in grant cycles in which formula funding is reduced by 10 percent or more.

The 10 percent score adjustment is provided to mitigate for the competitive disadvantage experienced by new applicants as a result of their lack of familiarity with the language of AmeriCorps, the application process, and/or other unique features that existing AmeriCorps programs are exposed to during program operations. The 10 percent score adjustment is not provided to mitigate for any program quality differential between new and existing programs.

Current policy defines a new applicant as: one in which neither the legal applicant, nor primary partnering organizations, nor individuals involved in developing the AmeriCorps application have ever developed an AmeriCorps application that has been awarded an operating grant.

In the new AmeriCorps rule, the Corporation has defined new programs as those in which the legal applicant has not received an AmeriCorps operational grant for 5 years or more as determined by the end date of the most recent grant period.

Staff Recommendation

Revise the new applicant definition to align with the Corporation's new policy: A new applicant is one in which neither the legal applicant, nor primary partnering organizations, nor individuals involved in developing the current AmeriCorps application have developed an AmeriCorps application that has been awarded an operating grant, or were previously employed as core program staff of a funded program, state commission staff, or Corporation staff *in the last five years*.

Apply the 10 percent adjustment following the peer review process to increase the likelihood that new applicants receive an invitation to the staff interview process. Once staff interview invitations are issued, the 10 percent adjustment will be removed, and then be reapplied in calculating the applicant's merit score.

Clarify that the 10 percent adjustment for the merit score (post peer review and staff interview) will be suspended when formula funding is reduced by 10 percent or more in comparison to the previous program year.

2006 AmeriCorps Grantmaking Policies
CSC STAFF RECOMMENDATION
Grantmaking Policy C.3. – Statewide Cost per MSY

Background

The Corporation establishes a limit on the average cost per MSY for states. This is intended to set funding limits while providing states with flexibility in selecting programs with varying costs.

Staff Recommendation

Revise statewide cost per MSY from $12,400 to $12,600 per Corporation guidance.

Background
The Corporation has historically required that AmeriCorps programs provide matching funds in the form of both non-federal cash and in-kind resources (non-cash contributions such as staff time, supplies, office space, etc). These two categories of match are collectively known as statutory match.

An AmeriCorps budget separates expenses into three broad categories: member costs (funds used for member living allowances and other direct expenses), program operating costs (funds for other necessary program expenses such as staff, supplies for members, training, etc.) and a percentage set aside for administration. The Corporation requires programs to provide non-federal cash match equal to at least 15% of its member costs, as well as in-kind match equal to at least 33% of its program operating costs.

Consistent with its recent focus on the issue of sustainability and cost-effectiveness, THE CORPORATION is now requiring programs to provide additional matching funds. Programs will provide these additional resources – known as regulatory or aggregate match – in addition to the cash and in-kind match that they have traditionally contributed.

Rather than focus on a specific budget section (member costs, program operating costs, etc.), the Corporation's new statutory match requirements refer to the *overall* amount that a grantee contributes to its AmeriCorps program. Put simply, the Corporation is now examining the bottom line – the total amount of funding that a grantee is contributing to the AmeriCorps program, laid alongside the total amount of funding that the federal government is contributing. For example, it may cost $1 million to administer a statewide tutoring program. Rather than simply examining the amount of cash match the program contributes for its member living allowances, the Corporation now requires a grantee to contribute match equal to a percentage of the $1 million program costs.

The Corporation has created a schedule of increasing percentages for its new aggregate match requirement. Programs that continue to receive AmeriCorps funding over the course of their lifetimes will be required to contribute an increasing percentage of aggregate match (capped at a specific point).

The Corporation does have the authority to waive statutory matching requirements, but it has historically been extremely reluctant to do so. Since the inception of the AmeriCorps program, the Corporation has granted one statutory match waiver.

In creating the new aggregate match requirement, the Corporation has also made a provision for waivers, known as regulatory match waivers, for programs that operate in rural or severely economically distressed areas. While these waivers would not entirely exempt programs from providing the requirement to provide aggregate match, they would decrease the required

percentage. The Corporation has stated that it does not anticipate granting a substantial number of regulatory match waivers.

Staff Recommendation
Staff recommends adoption of the Corporation's new regulatory matching schedule:

	Year 1 (%)	Year 2 (%)	Year 3 (%)	Year 4 (%)	Year 5 (%)	Year 6 (%)	Year 7 (%)	Year 8 (%)	Year 9 (%)	Year 10 (%)
Minimum Member Support	15	15	15	15	15	15	15	15	15	15
Minimum Operating Costs	33	33	33	33	33	33	33	33	33	33
Minimum Overall Share	N/A	N/A	N/A	26	30	34	38	42	46	50

Staff further recommends that CSC adopt a policy of not granting regulatory match waivers. Historical performance, as well as Corporation and CSC data, show that programs – including those in relatively rural and economically distressed areas – have been able to provide aggregate match in amounts that would meet requirements set out in the new schedule.

As CSC believes that increased amounts of aggregate match are one indicator of increased program sustainability, it encourages programs to provide match over and beyond the percentage required in this schedule. CSC will track implementation of the new match requirement and its impact on programs, and will re-examine its match policy on an annual basis.

In its grant selection process, staff will evaluate a program's match by considering:

- The percentage of match that has been secured by the time of the written application (or, for new applicants, well-developed plans for securing match);
- The percentage of matching resources contributed over and above the required amount;
- The extent to which matching resources offset core program costs (e.g., in-kind services from a professional evaluator, as opposed to a more attractive training venue); and,
- The diversity of match sources.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy A.1. – Issue Area Specialization

Background
Experience has demonstrated that AmeriCorps programs proposing to address multiple issue areas (e.g., education, the environment and public safety) generally face challenges in focusing on a specific community need that can realistically be addressed through the program, reporting significant community impact, presenting a coherent program design, etc.

Staff Recommendation
CSC values programs that are focused on a single issue area, or on multiple issue areas that are complementary. For example, an afterschool program might address the dual goals of providing tutoring aimed at building literacy and increasing math skills (education) while offering a safe haven for children during the hours immediately following the end of class while (public safety). Applicants addressing multiple issue areas should do so as part of an intentional, focused strategy.

Applicants with programs that encompass multiple issue areas are also required to develop performance measures that track outcomes in all relevant issue areas. In the example cited above, the applicant might build performance measures that address improved academic achievement and a reduced youth crime rate in the hours immediately following the close of school.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy B.1. – Community Need

Background

AmeriCorps was designed to focus the time, energy and skills of national service participants on pressing local needs. The Corporation and CSC have an interest in ensuring that grantees can identify *specific* needs and conditions that require AmeriCorps resources (e.g., that the Porterville Police Department has documented a 55% increase in youth-involved theft during hours immediately following the close of school, rather than a generic statement that there is a national trend toward higher youth crime in the hours after schools close for the day).

Current policy requires applicants to demonstrate a compelling community need through data that is of importance to the community.

Staff Recommendation

Applicants must document a compelling community need through *local* data that is of importance to the community being served. Proposed AmeriCorps member activities must directly relate to the identified need.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy B.2. – Added Value

Background

AmeriCorps was created to target unmet community needs (i.e., needs that are not already receiving attention through other programs and organizations). Current policy requires applicants to describe why AmeriCorps resources, rather than paid staff, volunteers or existing resources, are needed to address the needs identified in the proposed program.

Newly established Corporation policy prohibits AmeriCorps members from displacing either paid staff *or* volunteers.

Staff Recommendation

In addition to describing why AmeriCorps resources are needed in the community, applicants must establish that members will not displace existing staff or volunteers.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy B.3. – Members – Minimum Number per Operating Site

Background
Experience has shown that assigning individual AmeriCorps members to placement sites generally brings major challenges. At the program level, it is difficult for a lone AmeriCorps member to have a significant impact or bring about meaningful results. For members, single site placements often fail to provide a supportive environment conducive to effective service. Placed alone at their sites, members also lack connection to the larger national service community or even the immediate local program.

Some programs have successfully implemented single site placements by establishing a program design that provides members with a carefully designed support system. For example, one program places members individually in schools, but creates clusters in which each member is within walking distance of at least one other member. Members also have opportunities for frequent interaction with each other through regularly scheduled trainings, events that draw members and students from multiple schools, etc.

Staff Recommendation
CSC will review requests for exemptions to this policy if applicants are able to demonstrate that their programs provide adequate mechanisms for frequent member interaction *or* significant support from site staff and others. For example, a placement site would include the member in regular staff meetings and other activities, ensure that all staff (not simply the member's official site supervisor) routinely check in with the member, especially during the first several months of service, etc.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy B.4. – Tutoring Programs

Background
In January 2002, President Bush signed the No Child Left Behind Act (NCLBA) into law. NCLBA was designed to address the achievement gap between disadvantaged and minority students and their peers. NCLBA created mandatory standards and qualifications for a number of professional and paraprofessional positions, including tutors.

Over the past year, AmeriCorps programs have raised questions as to whether provisions of the NCLBA apply to programs in which members serve in schools, participate in afterschool programs, provide homework assistance, etc.

Staff Recommendation
Through its recent rulemaking process, the Corporation has issued guidance clarifying AmeriCorps program compliance with NCLBA.

A tutor is defined as
> someone whose primary goal is to increase academic achievement in reading or other core subjects through planned, consistent, one-to-one or small-group sessions and activities that build on the academic strengths of students in kindergarten through 12th grade, and target their academic needs. A tutor does not include someone engaged in other academic support activities, such as mentoring and after-school program support, whose primary goal is something other than increasing academic achievement. For example, providing a safe place for children is not tutoring, even if some of the program activities focus on homework help.

Corporation regulations further outline compliance requirements for both AmeriCorps members and programs.

AmeriCorps members who are considered employees of a local education agency or school, as determined by state law, must meet paraprofessional qualifications under the No Child Left Behind Act.

AmeriCorps members who are not considered employees of a local education agency or school, as determined by state law, must (1) successfully complete pre- and in-service specialized training, and (2) have a high school diploma or its equivalent, or a higher degree or pass a proficiency test.

AmeriCorps programs in which members engage in tutoring for children must:

- Articulate appropriate criteria for selecting and qualifying tutors;

- Identify the strategies or tools it will use to assess student progress and measure student outcomes;
- Certify that the tutoring curriculum and pre-service and in-service training content are high-quality and research-based, consistent with the instructional program of the local educational agency or with State academic content standards;
- Include appropriate member supervision by individuals with expertise in tutoring; and,
- Provide specialized high-quality and research-based, member pre-service and in-service training consistent with the activities the member will perform.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy B.6. – Community Emergency Response Team (CERT) Training

Background

California is a state prone to a wide variety of natural disasters (most notably, fires, earthquakes and floods). CSC believes that AmeriCorps members are valuable resources well-suited to assisting communities with their response to natural disasters, emergencies and acts of terrorism.

The federal Community Emergency Response Team (CERT) program is designed to prepare citizens to assist themselves and their neighbors in the event of a natural or man-made emergency. Administered in California by CSC, CERT provides training in fire safety, disaster medical assistance, light search and rescue, etc.

Staff Recommendation

CSC strongly encourages all applicants to provide basic level CERT training to all members. If this is not feasible, or if CERT training is not available in the local community, CSC recommends that programs provide all members with CPR and standard first aid training.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy C.1. – Volunteer Recruitment and Support

Background

For the 2003 AmeriCorps program year, the Corporation designated volunteer recruitment and support as a requirement and fundamental purpose of AmeriCorps. As a result, CSC adopted a volunteer recruitment and management policy that:

- Required programs to develop a volunteer recruitment and management component for their program;
- Allowed programs to determine how to meet the requirement by:
  - Involving all members or a subset of members in this program activity; and,
  - Allowing programs to recruit volunteers for national service days and/or ongoing volunteer activities that contributed to the direct service objectives of the program;
- Limited volunteer recruitment and management activities of AmeriCorps members to those that support the direct service performance measures of the program or placement site. Programs could not utilize AmeriCorps members to generate and manage volunteers for activities beyond the scope of the AmeriCorps program, e.g., recruiting volunteers to help build the capacity of the placement site; and,
- Required programs to report on their volunteer recruitment and management activities through a performance measure common to all programs – number of volunteers recruited and number of hours performed by volunteers.

In addition, CSC supported a volunteer recruitment and management funding priority for the 2003-04 and 2004-05 grantmaking processes that gave priority points to programs that included high-quality volunteer management practices in their program designs including:

- Substantive training for AmeriCorps members in volunteer support activities;
- Comprehensive support for volunteers including provisions for matching, screening and supervision, recognition, site supervision, and addressing liability issues; and,
- Recruitment and placement of a substantial number of volunteers in meaningful direct service roles.

Staff Recommendation

Staff recommends revising this policy to be consistent with our increasing understanding of the Corporation's interest in this area, volunteer management best practices, as well as our experience implementing this requirement in the field:

- Require all AmeriCorps programs and applicants to include a volunteer recruitment and/or support component in their program design.
  - Volunteer recruitment - recruiting community volunteers to participate in program-associated activities at the legal applicant, placement sites, or partnering organizations;

- Volunteer support - community volunteers recruited by the program or another organization are trained, given ongoing support, and provided with volunteer recognition upon the completion of their volunteer commitment.
- Programs are required to recruit or support volunteers, but are encouraged to do both. Programs that include both a volunteer recruitment <u>and</u> support component will receive greater consideration in the grantee selection process.
- As part of their service activities, AmeriCorps members must recruit and/or support community volunteers. This can be achieved by all members of the program participating in these activities or by a few members dedicated solely to this activity.
- In either case, all members participating in volunteer recruitment and/or support activities must receive training in best practices associated with volunteer recruitment and support.
- Volunteers may be recruited for one-time events or episodic events such as national service days, or long-term volunteer commitments. However, programs that engage community volunteers in long-term volunteer commitments will receive greater consideration in the grantee selection process.
- Volunteers may be recruited to support activities that are consistent with the community need identified in the program application. The activities for which volunteers are recruited must be consistent with allowable AmeriCorps member service activities. While they are charging time to the AmeriCorps grant, members may not support volunteers who are engaged in activities prohibited by AmeriCorps regulations.
- Programs that feel that the inclusion of a volunteer recruitment and/or support component is inconsistent with their program design may apply for a waiver. Criteria for granting a waiver include:
  o A program model in which members are engaged as professionals, such as teachers, attorneys, nurses, etc., and recruiting volunteers would detract from their professional tasks;
  o A program model in which the location or physical nature of member service activities prevents effective volunteer recruitment and/or support; or,

Waivers will only be approved in exceptional circumstances and only via recommendation from staff and approval by the CSC Program Committee.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy C.2. – Service Activities: Direct Service and Capacity Building

Background

Traditionally, AmeriCorps member activities focused on direct service activities. Other activities, such as clerical support and fundraising, often referred to as indirect service activities had been prohibited. In contrast, allowable activities for AmeriCorps*VISTAs, whose service activities must focus on indirect service, include: volunteer management, training direct service providers, coordinating projects, public speaking, writing press releases, organizing fundraising events, organizing task forces/coalitions, and conducting outreach.

In 2002, the Corporation amended regulations to broaden the definition of allowable indirect service activities, specifically in relation to AmeriCorps members performing capacity building activities. With greater emphasis on program sustainability, AmeriCorps members were permitted, for the first time, to assist grantee organizations in building capacity. Specifically, members were required to recruit and manage volunteers. Other allowable activities included conducting outreach, developing infrastructure to support a volunteer program, developing partnerships in the community and securing resources to support service activities.

Current CSC policy requires that programs focus on direct service requiring that all indirect service activities align with program goals. AmeriCorps members may raise funds directly in support of service activities that meet identified community needs.

With the new AmeriCorps rule, the Corporation has provided additional guidance regarding member service activities. This guidance includes:

- Direct service activities generally refer to activities that provide a direct, measurable benefit to an individual, group, or a community.
- Capacity building activities that enhance the mission, strategy, skills, and culture, as well as systems, infrastructure, and human resources of an organization that is meeting unmet community needs. Examples include:
  - Strengthening volunteer recruitment and management;
  - Conducting outreach and securing resources in support of service activities that meet specific needs in the community;
  - Helping build the infrastructure of the sponsoring organization/placement site; and,
  - Developing collaborative relationships with other organizations to achieve similar goals in the community.

In addition, the Corporation provides further guidance regarding allowable member fundraising activities, including seeking in-kind donations for goods to be used in support of the program's service activities (books, supplies, equipment, etc.). However, individual members may spend up to 10 percent of their term of service on fundraising activities.

Staff Recommendation

AmeriCorps resources should be invested in programs that:

- promote direct service as a means to address a compelling community need; and,
- demonstrate the capacity to operate an AmeriCorps program at the time of submitting an application.

AmeriCorps members are permitted to engage in capacity building activities that are consistent with the community need addressed by the program. Such roles may include, volunteer recruitment and/or support, fundraising, and conducting community outreach and partnership development. Member activities may not be primarily administrative in nature.

Individual AmeriCorps members may not spend more than 10 percent of their term of service engaged in capacity building activities. Capacity building activities are those defined by the Corporation, other than volunteer recruitment and/or support. In California, member time spent on volunteer recruitment and support will not be subject to limitations on capacity building. Programs that engage members in capacity building activities must develop one or more performance measures, to be reported on in the Strengthening Communities program area, that provide an outcome measure for each distinct member service activity in this area.

Further, members engaged in fundraising activities must abide by the following requirements:

- Member fundraising activities must be in support of the program's identified community need, and may not include fundraising activities that provide benefit to the placement site's general operating budget or endowment or that of other programs sponsored by the placement site;
- Members may not fundraise for required matching funds necessary to cover member support costs (living allowances, FICA, worker's compensation, or health insurance) for the program year in which they serve or for future program years;
- Members may not prepare grant applications for funding provided by the Corporation for National and Community Service or any other federal agency; and,
- Members may not participate in fundraising activities unless specifically outlined in the position description and agreed to by the member.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy C.3. – Days of Service

Background

Organizations promote service and volunteerism through a number of vehicles, including days of service in which a wide range of people participate in volunteer projects on a designated day. Days of service focus on a particular theme or group (Martin Luther King, Jr. Day of Service, Cesar Chavez Day of Service and Learning, Youth Service Day, Make a Difference Day, etc.). Since these days of service national or statewide in scope, they create a strong platform for promoting volunteerism and convey to event volunteers – including AmeriCorps members – that they are participants in a larger movement that extends beyond their local community.

Staff Recommendation

CSC requires all programs to participate in at least one or more days of service. This provides AmeriCorps programs with an opportunity to extend their required volunteer program and engage the broader community in service projects.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy D.1. – Member Training Plans

Background
Experience demonstrates that members are not well-positioned to have a meaningful impact on community needs unless they have been oriented to their positions and receive initial and ongoing training that includes skills and knowledge relevant to their service. Orientations also assist in building *esprit de corps* and conveying a sense that members are participants in a national program.

Current policy dictates that members must receive an initial orientation that includes information about the community they serve, the history of national service, expectations of members and specific training for the service they will provide. Members must also receive ongoing training that supplements and builds upon their initial orientation.

Staff Recommendation
Programs must provide members with opportunities to collectively take the AmeriCorps pledge or a similar oath.

Member training must include volunteer management, a civic education component focused on development of members as lifelong engaged members of their communities, site specific topic areas and an end of service component that includes topics such as use of the education award, future national service opportunities, career or continuing education options, etc.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy D.3. – Member Supervision

Background
High quality member supervision is critical to the success of an AmeriCorps program. Since members are the mechanism for service delivery, inadequate member supervision compromises a program's ability to impact community needs.

Staff Recommendation
Supervisors are charged with providing members with regular oversight. In addition to information on relevant policies and procedures, supervisor training should also impart skills and knowledge that will prepare supervisors to guide members and provide useful advice on their service. Supervisors must be prepared and trained prior to actual placement of members.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy E.1. – Terms of Service

Background

AmeriCorps was designed to provide members with intensive service experiences. While an ideal position would engage members in full-time service such as that performed by Peace Corps Volunteers, other positions could enroll members in "terms of service" that would provide meaningful experiences while allowing for a degree of flexibility in individual program designs. In addition to a full-time (1700 hours per year) term of service, AmeriCorps allow for 900, 675, 450 and 300 hour terms of service.

Terms of service of less than 1700 hours are meaningful only to the extent that they provide members with a focused and intensive experience. For example, a member with no formal obligations (college enrollment, a full-time job, etc.) would not need to make a major commitment to enroll in a 300 hour (i.e., 6 hours per week) term of service. A full-time student, however, would need to make a significant commitment if (s)he were to serve 300 hours over the course of a nine-month academic year.

Staff Recommendation

CSC strongly encourages applicants to utilize the most intensive term of service appropriate to their program designs.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy E.2. – Member Eligibility

Background

AmeriCorps' enabling legislation set forth requirements for member eligibility. Programs are responsible for ensuring that the members they enroll meet all required conditions.

Staff Recommendation

Member eligibility criteria generally fall into one of three categories: legal status, age and education.

Generally, an eligible member is an individual who is:

- A US citizen, US national or lawful permanent resident alien of the United States; and,
- At least 17 years of age at the commencement of service.

If a member is a US citizen, US national or lawful permanent resident alien of the United States and is not at least 17 years of age at the commencement of service, (s)he must:

- Be enrolled in a full-time, year-round youth corps or full-time summer program, and between 16-25, inclusive; or,
- Be enrolled in a program for economically disadvantaged youth and between 16-24, inclusive; and,
- Have a high school diploma or GED, or agree to obtain one before using an education award; or,
- Have been deemed incapable by an independent assessment of obtaining a high school diploma or its equivalent.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy E.3. – Living Allowances

Background

The Corporation has established guidelines governing the amount of the living allowance that may be paid to an AmeriCorps member. The Corporation typically provides for a slight annual increase in the minimum and maximum living allowances.

Staff Recommendation

For the 2006-07 grant cycle, the Corporation has established the following minimum/maximum living allowances and their associated terms of service:

Term of Service	Minimum	Maximum
1,700 hour:	$10,900	$21,800
900 hour:	$5,770	$11,540
675 hour:	$4,328	$8,655
450 hour:	$2,885	$5,770
300 hour:	$1,923	$3,845

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy E.4. – Education Awards

Background
AmeriCorps' enabling legislation set limits on the total number of education awards that an AmeriCorps member could earn over the course of his/her lifetime.

Staff Recommendation
Staff recommends adding the following language to existing policy: "A member is only eligible to receive an education award for two terms of service."

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy E.5. – Other Benefits

Background

In addition to a living allowance and education award, AmeriCorps provides child care and health insurance to those members who qualify. Generally, members who qualify for these additional benefits are those who are enrolled in a full-time (1700 hour) term of service.

Program may engage members full-time, but enroll them in a part-time term of service. For example, a program might send its members to perform full-time environmental conservation projects while living in state or national parks. If they members only served from April through September, however, they would technically be enrolled in a part-time (900 hour) term of service. Members in situations such as this are serving in a full-time capacity and are therefore entitled to the same child care and health insurance benefits offered to 1700 hour members.

California law stipulates that AmeriCorps members are covered under the legal applicant's workers' compensation insurance policy.

Staff Recommendation

Clarify that members serving in a full-time capacity receive the same benefits as members enrolled in a full-time 1700 hour term of service.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy E.6. – Member Management

Background

Member issues encompass a wide range of items, including member living allowances, education awards, terms of service, benefits, etc. AmeriCorps policies also govern personnel practices such as the way in which member grievances are handled.

Staff Recommendation

Staff recommends that the current policy be revised to retain the required member grievance procedure, but remove references to the AmeriCorps pledge (addressed in Program Design Policy D.1.) and the Service Gear package (addressed in contract and RFA budget documentation).

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy F.1. – Performance Measures

Background

The National and Community Service Act of 1990, as amended, requires applicants for funding to apply measurable performance goals to determine the impact of AmeriCorps on communities and participants. Since 1993, programs and state commissions have used various forms of performance measurement to articulate program goals and results. In California, programs have been required to develop performance measures in each of the three program design categories: Needs and Service Activities (direct service); Member Development; and, Strengthening Communities.

In 2003, the Corporation launched a new initiative to strengthen the accountability and performance of AmeriCorps programs nationwide. This initiative introduced new language – output, intermediate-outcome and end-outcome performance measures in alignment with a logic model. The Corporation required applicants to develop 3-5 performance measures across the three program design categories. CSC required a minimum of three performance measures, including one output, an intermediate outcome and an end outcome with one of the three focused on volunteer recruitment.

For the 2004 program year, CSC required that applicants develop a minimum of four performance measures with a minimum of one in each of the three program design categories. Each of the four performance measures was to include an output with at least one measuring an intermediate outcome and one an end outcome. The required end outcome was to measure the program's primary service activity. One of the four measures was to be a volunteer recruitment performance measure measuring: 1) the number of community volunteers recruited; and, 2) the number of service hours performed by the community volunteers.

With the new AmeriCorps rule, the Corporation requires: 1) one set of aligned performance measures (one output, one intermediate outcome, and one end outcome) that capture the results of the program's primary activity; and, 2) any performance measures submitted beyond the minimum requirement may or may not be aligned measures. In addition, the Corporation requires that at a minimum, grantees report on their output measure after year one of the grant, the output and intermediate outcome after year two, and the output, intermediate, and end outcome by the completion of the term of the grant.

Staff Recommendation

Staff recommends revising CSC performance measure requirements as follows for both new/recompeting applicants as well as continuation programs for the 2006-07 program year:

General Requirements
- Applicants must report on all performance measures, including output, intermediate outcomes, and end outcomes, on an annual basis.

- Applicants must develop at least one performance measure in each of the program design categories: Needs and Service Activities, Member Development, and Strengthening Communities.

Needs and Service Activities
- Applicants must develop a set of performance measures that account for 80 percent of the non-member training hours completed by members.
- Applicants must develop an output, intermediate outcome, and end outcome measure on their primary service activity. Primary service activity is defined as the member service activity for which the greatest number of member service hours (cumulative across the program) are dedicated.
- Performance measures for activities other than the primary service activity must include a minimum of an output and intermediate outcome measure. Applicants that develop an end outcome for such measures will receive greater consideration in the selection process.

Member Development
- Applicants must develop, at a minimum, one output measure related to training provided to members in completing their term of service. For example, 20 members completed the member training plan (orientation, ongoing training, and site-specific training).
- Applicants are encouraged to develop additional outcomes related to member development, including intermediate outcomes measuring member mastery of training content based on pre and post evaluations, and/or end outcomes that measure the percentage of members who enter specific education programs (such as teacher certification programs) or career paths (public or non-profit careers) following the completion of the term of service.

Strengthening Communities
- Applicants must develop a volunteer recruitment and/or support performance measure. Programs that engage members in volunteer recruitment must provide an output measure on the number of volunteers recruited by the program. Programs that provide ongoing support to volunteers must provide an output measure on the number of volunteer hours provided by community volunteers. Programs engaged in both volunteer recruitment and support must measure both activities.
- Applicants proposing that members engage in capacity building activities beyond the volunteer recruitment and/or support requirement, must develop a performance measure resulting in an outcome for each activity. For example, a program who engages members in fundraising activities must develop an outcome, such as funding secured, for the members' activities.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
Program Design Policy F.2. – Standardized Performance Measures

Background
CSC established this policy for the 2003 AmeriCorps program year to enable staff to develop common performance measures across programs in areas where a great deal of program activity occurs, such as tutoring programs or volunteer management.

For the 2003-04 program year, CSC established common performance measures volunteer management and civic education. The volunteer management performance measurement required all programs to measure two outputs: 1) the number of community volunteers recruited; and, 2) the number of service hours performed by community volunteers. For example, during the 2003-04 program year, AmeriCorps members recruited 15,816 volunteers who served 211,878 hours.

Staff has not developed additional common performance measures in the Needs and Service Activities program area as originally envisioned.

Staff Recommendation
Staff recommends changing the policy statement from:

*CSC **will** establish a core set of widely accepted outcome indicators and data collection procedures for issue areas in which CSC funds a number of programs (e.g., tutoring programs).*

To:

*CSC **may** establish a core set of widely accepted outcome indicators and data collection procedures for issue areas in which CSC funds a number of programs (e.g., tutoring programs).*

This change would give staff the flexibility to establish common measures as deemed appropriate, but does not require staff to do so.

2006 AmeriCorps Program Design Policies
CSC STAFF RECOMMENDATION
New Program Design Policy – Evaluation

Background

The National and Community Service Trust Act stresses the value of outside evaluations of a program's effectiveness and activities. Independent evaluations can establish the impact that an AmeriCorps program has had on a community (as opposed to what might have taken place had the program not been in existence), provide useful insight into potential avenues for improvement, generate information on aspects of the program that might be replicated in other communities, etc.

Since 2003, the Corporation has laid greater emphasis on the value of these evaluations. Its 2003 and 2004 guidance required programs that had conducted outside evaluations to submit evaluation results with their grant applications.

In its new rule, the Corporation set out an evaluation requirement for all AmeriCorps programs supported through competitive or national direct grants. All competitive and national direct grantees receiving an average grant of $500,000 or more over a five-year period must arrange for an independent evaluation of their program and submit the results to the Corporation. Programs that compete for a second three-year grant must submit either a summary of their evaluation plan or the actual evaluation results. Programs competing for their third three-year grant are required to submit the completed evaluation. Programs that do not meet the $500,000 threshold are required to conduct internal evaluations. The Corporation has not issued a definition of internal evaluation.

Numerous state commission and direct Corporation grantees have requested clarification on implementation of the evaluation requirement. The Corporation has yet to issue definitive guidance on several fundamental issues (definition of an evaluation, portion of a program that is required to be evaluated, etc.). CSC is working with other national service partners to clarify this requirement so that it can be effectively implemented.

Staff Recommendation

CSC supports the practice of evaluation (whether independent or internal) and believes that it can assist a program in continuous improvement, communicating the program's value to a range of stakeholders, etc. It will therefore require all grantees – formula and competitive – with average grants of $500,000 or more over a five-year period to arrange for independent evaluations. Competitive programs that do not meet this threshold are required to complete an internal evaluation. Formula programs with average grants of less than $500,000 should plan to conduct an internal evaluation.

Program budgets should include evidence of plans to conduct an evaluation.

CSC will continue to seek clarification from the Corporation regarding the content of independent and internal evaluation, and will develop additional policies and guidance consistent with new information.